

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS CUMMINGS on behalf of himself)
and others similarly situated,)
Plaintiff,) Case No. 1:12-cv-09984
v.) Judge Gottschall
SALLIE MAE CORP.,)
Defendant.)

**STIPULATION TO EXTEND DEADLINE
TO FILE REPLY BRIEF IN SUPPORT OF CLASS CERTIFICATION,
TO TAKE THE FULL BRIEFING UNDER ADVISEMENT,
AND TO NOT ISSUE A RULING UNTIL AFTER MEDIATION**

Plaintiff Nicholas Cummings (“Plaintiff”) and Defendant Sallie Mae, Inc. (“Defendant”) stipulate as follows:

WHEREAS, on May 6, 2013, Defendant filed its Opposition to Plaintiff's Motion for Class Certification. (DE 38-40)

WHEREAS, Plaintiff's Reply is due May 20, 2013. (DE 37)

WHEREAS, in support of its Opposition, Defendant filed, among other things, the declaration of David A. Moss (DE 38-2).

WHEREAS, after a FRCP 30(b)(6) deposition on May 2, 2013, Plaintiff requested and Defendant agreed to provide the deposition of Mr. Moss on May 30, 2013, and to supplement a variety of class discovery, which Sallie Mae hopes to provide by June 28, 2013.

WHEREAS, on July 29, 2013, the parties are scheduled to engage in mediation at JAMS before the Honorable Morton Denlow (ret.).

WHEREAS, Plaintiff and Defendant request that the deadline to file Plaintiff's reply brief in support of his Motion for Class Certification be extended until July 22, 2013.

WHEREAS, counsel for Plaintiff and Defendant have agreed (1) to extend the deadline for Plaintiff to file his reply brief in support of his motion for class certification until July 22, 2013; and (2) to request that this Court take the full briefing under advisement and not issue a ruling until after the parties' mediation on July 29, 2013.

May 17, 2013

Respectfully submitted,

/s/ Keith J. Keogh

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